

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
v.)	No. 08 CR 386-3
)	Honorable Judge Coar
)	Magistrate Judge Ashman
RODNEY RAY, et. al.,)	
)	
Defendants.)	

**RODNEY RAY’S MOTION FOR PRETRIAL PRODUCTOIN OF
CHARTS, SUMMARIES, AND CALCULATIONS**

Defendant, RODNEY RAY (“Mr. Ray”), by and through his undersigned attorney, pursuant to Rule 1006 of the Federal Rules of Evidence, and Rule 16(a)(1)(C)-(E) of the Federal Rules of Criminal Procedure, and the Fifth and Sixth Amendments to the United States Constitution, respectfully moves this Court for the entry of an Order directing the Government to produce the final version of any charts, summaries, or calculations that it intends to use at trial, at least sixty (60) days prior to trial. In support of this Motion, Mr. Ray states as follows:

1. Production of the final versions of the Government’s charts, summaries, and calculations at least sixty days prior to trial is necessary so that Mr. Ray and his counsel are afforded sufficient time to counter

WHEREFORE, Defendant, Rodney Ray, by his undersigned counsel, respectfully request the entry of an Order directing the Government to produce the final version of any charts, summaries, or calculations that it intends to use at trial, at least sixty (60) days prior to trial, and for such other and further relief as is appropriate under the circumstances.

Respectfully Submitted,

By: /s/ Michael I. Leonard
Attorney for Defendant Rodney Ray

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Dated: July 1, 2008

CERTIFICATE OF SERVICE

I, Michael I. Leonard, an attorney, certify that on July 1, 2008 I caused a copy of Rodney Ray's Motion for Pretrial Production of Charts, Summaries, and Calculations, to be served on the attorney(s) of record through the Court's ECF filing and notice system on July 1, 2008.

Respectfully Submitted,

By: /s/ Michael I. Leonard
Michael I. Leonard